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Financial Services Guide

Willis Australia Limited

June 2026

wtwco.com.au

Lack of independence in relation to the provision of personal advice to retail clients

We are not independent, impartial or unbiased in the provision of personal advice to retail clients. This is because in certain cases a conflict of interest arises i.e. circumstances where some or all of our retail clients' interests are inconsistent, or diverge from, some or all of our interests. This may happen where:

- we may receive remuneration or other gifts or benefits from:
  - the issuer of the products retail clients buy (e.g. brokerage that we retain); or
  - other third parties for related services provided in connection with the personal advice service (premium funding, claims or loss adjusting or reinsurance services),

  which may reasonably be expected to influence the personal advice provided to our retail clients;
- we may be subject to direct or indirect restrictions relating to the financial products in respect of which personal advice is provided; and
- we have associations or relationships with issuers of financial products and others that might reasonably be expected to influence the personal advice provided to retail clients (as covered in this FSG).

However, it is important to note that when providing personal advice we are required under the Corporations Act 2001 to always act in our clients' best interests. We also have procedures for the proper management of conflicts of interests as covered in this FSG.

Introduction

This Financial Services Guide (FSG) is designed to assist you in deciding whether to use any of the financial services, provided by Willis Australia Limited, ABN 90 000 321 237, AFSL 240600 (**Willis**) that are described in this FSG.

This FSG contains information on:

- The services we are authorised to provide to you
- Our remuneration
- Our internal and external dispute resolution procedures
- Other important information.

Other documents you may receive from us

STATEMENT OF ADVICE (SOA)

If you are an individual or small business and purchase retail or personal insurance, we may provide you with personal advice that takes into account your personal needs, objectives or financial situation. If you receive personal advice, we will provide you with a Statement of Advice (SoA) which will contain our advice, the basis of our advice, any commission, fees and any other benefits, where possible, in actual dollar amounts, and any associations we have with Insurers or other parties which may have influenced the advice provided. We will give you this SoA before we proceed to act on your instructions.

PRODUCT DISCLOSURE STATEMENT

you are an individual or small business and purchase retail or personal insurance, where required, we will give you a Product Disclosure Statement (PDS) when recommending to you a particular insurance product. The PDS is prepared by the Insurer and contains information about the product recommended, to help you make a more informed decision about whether or not to purchase the product.

Who is Willis?

Willis is a general insurance intermediary, and our ultimate parent is Willis Towers Watson PLC, a company incorporated in the Republic of Ireland and listed on NASDAQ.

Willis is a member of the National Insurance Brokers Association (NIBA) and is bound by the Insurance Brokers Code of Practice (Code). The Code sets out standards of conduct for insurance brokers to follow when dealing with clients. The Code is available from the NIBA website at www.niba.com.au.

What financial services are we authorised to provide?

Willis has an Australian Financial Services Licence and the number is 240600. This licence allows us to provide advice on and deal in general insurance products, investment life insurance products, life risk insurance products, interests in owned managed investment schemes as an insurance broker, superannuation and miscellaneous financial risk products limited to mutual risk products, to retail and wholesale clients.

What are our services?

Where we act as your insurance broker, we will discuss with you your insurance requirements, including the scope of cover and limits to be sought, and cost. Upon receipt of your instructions, whether written or oral, we will endeavour to satisfy your insurance requirements.

During the course of the placement of your insurance we will keep you informed of the progress of our negotiations and identify any inability to obtain coverage sought by you.

We will use reasonable endeavours to implement your insurance programme, subject to available insurers, before the intended date of inception, renewal or extension of cover (whichever is appropriate).

We will provide you with information about the insurance cover that we will advise and recommend to you to enable you to decide whether to accept the insurance cover available. We will answer any questions you may have about the available cover, its benefits, restrictions, exclusions and conditions.

We do not offer advice in relation to tax, accounting, regulatory or legal matters. You should take separate advice as you consider necessary regarding such matters.

How can you instruct us about your insurance?

You may instruct us about your insurance by telephone or in person, by fax or email, or by other means as we agree with you.

Who do we act for?

As an insurance broker we normally act for you as your agent. We will tell you if we are not acting for you in providing any of the financial services.

For example, for some insurance products, insurers grant us a binding authority or similar facility to accept business on their behalf. When we place your insurance under a binding authority or similar facility, we act for you when we provide you with advice or a product recommendation, but we act for the insurer when we issue the insurance contract.

We may also be granted an authority by insurers, for example under a binding authority, to settle claims on your insurance. We act for the insurer when we settle claims within the terms and conditions of the authority granted. It is our policy to refer claims to insurers for settlement decision where we are not able to settle the claims on a 100% basis.

What if we have a conflict of interest?

Circumstances may arise where we may find we have a conflict of interest in, or otherwise have a material interest in or related to, a matter in which we are acting. For example, we may be asked to act on behalf of any insurer in the appointment of a loss adjuster; or, we may find that the interests of two of the clients for whom we act, conflict.

We have conflict management procedures and we seek to avoid conflicts of interest but where a conflict is unavoidable we will explain the position fully and manage the situation in such a way as to avoid prejudice to any party.

The insurance market is complex and there could be other relationships not described here which might create conflicts of interest. Whatever the circumstances, we will act in your best interests and, if a conflict arises for which there is no practicable solution, we will withdraw unless you wish us to continue to act for you and provide us with your written consent to that effect.

What are our Professional Indemnity provisions?

Willis has Professional Indemnity cover in place which satisfies the requirements for compensation arrangements under section 912B of the *Corporations Act 2001*. Subject to the terms and conditions, this includes coverage for existing and former employees for insurance services conducted as employees of Willis.

What should you do if you have a complaint?

Willis has a formal complaints procedure. Should you have a complaint please contact your Willis client advocate in the first instance.

Alternatively, you may contact our Complaints Officer:

T: (02) 9285 4000

E: compliancequeries.au@willistowerswatson.com

We will acknowledge your complaint within one business day of receipt and advise you who the prime contact for handling your complaint is. We aim to resolve complaints within 30 days of receipt but if your complaint is complex and may take more than 30 days to resolve, we will keep you informed on the progress and when we expect to provide our final response.

We are a member of the Australian Financial Complaints Authority (AFCA), an external dispute resolution facility. If an issue has not been resolved to your satisfaction, you can lodge a complaint with AFCA. AFCA provides independent financial services complaint resolution that is free to consumers.

W: www.afca.org.au

E: info@afca.org.au

T: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

You can also contact Willis to comment upon our service at https://www.wtwco.com/en-AU/Contact-Us

What about Privacy?

We respect your privacy and are committed to protecting your personal information. Our Privacy Policy explains how Willis collects, uses and discloses the personal information you provide and what Willis expects of you in this regard.

By proceeding to deal with us, you confirm on your behalf and/or on behalf of those you represent, agreement to the collection, use and disclosure of personal information described within our Privacy Policy.

Please contact your Willis client advocate or local Willis office or visit our website for a copy of our Privacy Policy.

https://www.wtwco.com/en-au

What is your Duty of Disclosure?

In order to make our business relationship work, you must provide complete and accurate information and instructions in a timely manner, so that we can assist you fully.

Please bear in mind that there is no duty on insurers to make enquiries of you. You have a duty to disclose to the insurer before a contract of insurance is entered into, every matter that is known to you that is relevant to the decision of the insurer whether to accept the risk.

Failure to comply with your duty of disclosure may allow insurers to avoid liability for a particular claim or to void the policy. This duty of disclosure applies equally on taking out new insurance policies and on renewal or any change (variation, extension or endorsement) to your policies. We will not be responsible for any consequences which may arise from any delayed, inaccurate or incomplete information.

What if there is a change in your circumstances?

You must advise us as soon as reasonably practicable of any changes in your circumstances that may affect the services to be provided by us or the cover provided under your insurance policy. We may need to give you advice as to the suitability of the insurance for your changed circumstances to ensure it remains appropriate for your needs, objectives and financial situation.

How do you pay for our services?

Our remuneration will be either brokerage, which is a percentage of the insurance premium paid by you and allowed to us by the insurer with whom the insurance contract is placed, a fee as agreed with you, or a combination of fee and brokerage depending on your program and the various businesses within the Willis Group of Companies that provide services to you.

Some commissions earned by us on a policy may be refunded if the policy in question is cancelled within twelve months of inception.

A policy administration fee (on a per invoice basis) may also apply. We will advise you of the amount of the policy administration fee when we provide you with the insurance quote.

The range of brokerage we earn on the general insurance products we place will vary depending on the product purchased but will generally range from 0% to a maximum of 37.5 % for certain products.

The table below sets out information about the range of fees and commissions we are likely to charge for the life insurance and superannuation fund consulting services we may provide you:

Service	Fees
Group Life Insurance Products	As agreed with you in advance of provision of the service OR where no prior agreement, up to 30% of insurer premium each year
Retail Life Insurance Products	As agreed with you in advance of provision of the service
Superannuation Fund Consulting Services	By fixed fee as agreed with you

You can request further particulars in relation to the remuneration we receive.

What remuneration is received by our Employees?

Our employees receive an annual salary that may include discretionary annual bonuses based on pre-determined business performance criteria such as client service standards and business profitability. They may also from time to time be eligible to receive incentives or bonuses based on business retention or generation. In addition, employees may be eligible to participate in any Willis share plan that may be offered on a discretionary basis from time to time.

Our Health & Benefits business employees may not accept benefits from insurers in excess of $300 in value.

These benefits may include entertainment at sporting events, hospitality, including lunches and attendance at insurer sponsored functions. It is not possible to determine in advance what, if any, non-monetary benefit a representative may receive and these benefits are not generally attributed to any particular product.

What other remuneration do we receive?

INSURERS

We may have contracts or other arrangements with various insurers pursuant to which we provide certain services, such as performing risk management surveys or those under binding authorities and delegated claims settlement arrangements (for example, providing statements of the business accepted, issuing certificates of insurance cover or settling claims on behalf of insurers). Under these arrangements we may be paid by the insurers for the services provided to them in addition to any brokerage we may receive for placing your insurance cover.

PREMIUM FUNDING

You may also choose to use a Premium Funding Finance company (Funder) in connection with the insurance we place for you. The details of your premium funding arrangement will be set out in your separate agreement with the Funder. We will receive a commission of between 0% to 4% of the amount of funding provided to you. We may receive a fee in respect of specific services we provide to the Funder. Please ensure you review the agreement with the Funder, including the remuneration arrangements before making a final decision to use the Funder.

INTEREST

In the ordinary course of business we may also receive interest on client and insurer monies from the date when we receive funds until we settle with those due to receive them. We confirm that we shall retain that interest rather than pay it to you or the insurer (as the case may be).

REFERRALS

If you are an individual or small business and purchase retail or personal insurance and you have been referred to us by someone else, we may pay the referrer a share of our fee or brokerage in relation to that referral, generally ranging from a minimum of 1% to a maximum of 50%.

What association do we have with Related Service Providers?

When arranging cover for you, we may recommend that you use the services of Richard Oliver Underwriting Managers Pty Limited, AFSL Licence Number 238334 (ROUM), a member of Willis Group of Companies.

Willis may receive brokerage from this company if one of their insurance products is purchased, generally ranging from a minimum of 0% to a maximum of 37.5%.

ROUM may act for insurers with whom your risks are insured in the placement and administration of the insurer's risks. These activities are separate contracts subject to their own

terms and conditions including those relating to remuneration, between the insurer and ROUM.

REFERRALS

It may, at times, be appropriate (and for your benefit) for us to use other parties such as wholesale brokers, excess and surplus lines brokers, underwriter managers, managing general agents or reinsurance intermediaries. These parties may also earn and retain commissions for their role in providing products and services for you. If any such parties are part of Willis Group of Companies, we will disclose the form of compensation they will earn before insurance is purchased.

What other Remuneration arrangements are there within Willis Group of Companies?

PLACEMENT-SPECIFIC MARKET-DERIVED INCOME

We or other companies within Willis Group of Companies have contracts with various insurers under which Willis Group of Companies provides certain services, such as those under binding authorities, managing general agency and line slip arrangements (for example, providing statements of the business accepted and the issuance of certificates of insurance cover).

Willis Group of Companies may also provide reinsurance broking services for insurers. We may also enter into service agreements with certain insurers in order to assist the development of insurance products for our clients.

Under these arrangements Willis Group of Companies may be paid by the insurers for the services we provide to them in addition to any fees or commissions Willis Group of Companies may receive from you for placing your insurance cover.

WILLPLACE PLACEMENT PLATFORM (WP PLATFORM)

Willis Group of Companies affiliate, Richard Oliver Underwriting Managers Pty Ltd (ROUM), has developed a digital placement platform, the WP Platform, which allows us to efficiently obtain competitive quotations from panels of established insurers, and in some cases, under the terms of insurance product wordings also developed by ROUM.

ROUM provides the platform access and related services (including data intake, workflow management, reporting and documentation support) to participating insurers, together with licencing of product wordings, where applicable. In consideration for these services, participating insurers pay ROUM fees. Work transfer fees typically fall within a range of approximately 2 % to 4 % of premium (excluding statutory charges and taxes), depending on the class of business and services provided.

CONTINGENT COMPENSATION

Willis Group of Companies may accept certain forms of contingent compensation in locations where they are legally permissible and meet standards and controls to address conflicts of interest. Because insurers account for contingent payments when developing general pricing, the price our clients pay for their policies is not affected whether Willis Group of Companies accepts contingent payments or not. If a client of Willis Group of Companies prefers that we not accept contingent compensation related to their account, we will request that the client's insurer(s) exclude that client's business from their contingent payment calculations.

GLOBAL360 FACILITY – GLOBAL SPECIALITIES CLIENTS ONLY

Willis Group of Companies has developed a facility for business placed through our London Global Specialties businesses called Global360, which offers underwriting capacity for specialised risks and under which Willis Group of Companies provides a range of services to participating insurers. A separate fee is paid by such insurers for the delivery of these services to them. This fee is calculated within a range, depending on the scale of services provided, further details of which we will identify to you prior to placement. Insurers have agreed that they will bear this fee as part of their operating costs and not to increase premiums directly payable by Willis Group of Companies' clients.

FINMAR – FINEX PLACEMENTS

A separate Business Unit within Willis Group of Companies, FINMAR Market Services, provides a wide range of services direct to certain insurers that place business for FINEX clients globally. A separate fee is paid to FINMAR Market Services by insurers for the delivery of these services to them. This fee is calculated within a range of 3.125% and 5.25% (plus applicable tax) of the overall premiums placed depending on the scale of services provided. Insurers have agreed that they will bear this fee as part of their operating costs and not to increase premiums directly payable by Willis Group of Companies' clients.

PANELS

Willis Group of Companies develops panels of insurers in certain market segments. Participating insurers are reviewed on a variety of factors. Commission rates on panel placements may be higher than rates paid on business placed outside of the panel process. Willis Group of Companies discloses its commission rates to clients on quotes obtained through the panel process prior to binding the coverage. In some instances, insurers pay an administration fee to participate in the panel process. Your Willis broker will provide you with additional information on Willis Group of Companies Panels upon request.

BROKERAGE ON FEE BUSINESS

In some territories outside of North America, Willis Group of Companies obtains brokerage on business where our client pays us a fee. Our intention is to seek remuneration for work that Willis Group of Companies carries out for all parties in the insurance transaction but for which Willis Group of Companies is not otherwise sufficiently compensated. Some examples of this are the vastly-increased cost of regulation, distribution and infrastructure costs. This brokerage that Willis Group of Companies receives is a set percentage and is not contingent on achieving any level of growth, retention or profit on the business concerned. You can choose to exclude your placements from being included in any of these carrier agreements.

SUBSCRIPTION MARKET BROKERAGE

Willis Group of Companies adds Subscription Market Brokerage in some of its core specialty businesses that place business into the subscription markets, predominantly in London. The principles underlying this Subscription Market Brokerage program include the following:

- Willis Group of Companies is required to handle increased infrastructure costs such as those arising from presentations to and negotiations with multiple entities in the subscription market;
- Willis Group of Companies performs additional administrative, regulatory, accounting and support functions in order to complete subscription market placements. These functions benefit our clients and insurers; and
- Working groups of insurers in the subscription market recognize these additional costs and agree that a negotiated percentage of the premium to account for these costs is appropriate and helps assure competitive access to that market.

Willis Group of Companies believes that the best way to defray the cost of these functions is through this brokerage. We will disclose the receipt of Subscription Market Brokerage to you.

FACILITY ADMINISTRATION CHARGES AND PROFIT COMMISSIONS

Willis Group of Companies operates a number of "facilities" (Binders, Lineslips, Programs, Managing General Agents (MGAs) and Arrangements) under which we undertake a number of tasks. Some of those tasks are purely for the benefit of our clients, others are services that an insurer would be expected to perform.

Our remuneration may reflect this multi-beneficiary approach with what is known as a facility administration charge that covers the cost of these activities. A facility administration charge is additional to the fee or brokerage that Willis Group of Companies receives for placement and other services to clients. We will disclose any such charges to you. These facilities typically apply to straightforward, small business lines or specialist product areas, for example, commercial combined, motor, personal lines, personal accident and terrorism. The type of business written in these facilities tends to be high-volume, low-premium business that would not be viable for insurers to write individually on the open market. By grouping this business together, clients enjoy the benefits of a broad product, suited to their needs and the cost savings of collective buying power. In a very limited number of cases a portion of our remuneration may be driven by the underwriting profitability of the facility. There is a potential for us to earn such "profit commissions", but, because this business is grouped together, it is not possible to determine the extent to which the profitability of a book is affected by any single client.

GEMINI

Willis has developed a facility to assist in the placement of open market subscription risks, called Gemini. Gemini offers guaranteed automatic follow underwriting capacity of up to 12.5% from Lloyd's Market insurers following selected lead markets. In addition to providing guaranteed access to follow capacity with the strength of the Lloyd's Market, Gemini offers competitive pricing benefits for our (re)insured clients, amounting to lower contract premiums of 2.5% from the lead (re)insurer's price (or a 2.5% lower contract premium to the composite price if blended premiums are applicable). Due to the automatic follow nature of the Gemini facility, the participating (re)insurers have agreed to outsource to Willis the following services that they would normally undertake for themselves, including:

- Quoting and binding risks on behalf of the participating (re)insurers at the agreed 2.5% lower contract price once qualifying terms have been obtained from a lead (re)insurer;
- Production, signing and issuance of (re)insurance contractual documentation on the (re)insurers' behalf;
- Gathering and reporting of statistical risk information such as exposure aggregations;
- Provision of information to the Gemini (re)insurers to enable them to provide regulatory compliance information on contract certainty matters; and
- Claims administration.

A separate fee is paid to Willis by participating Gemini (re)insurers for the delivery of these services to them. The Gemini (re)insurers have agreed that they will bear this fee as part of their operating costs and not increase premiums directly payable by Willis' clients. Further details of the Gemini fee (which is calculated by reference to a percentage of premium for the Gemini participation) are available upon request.

In providing the above services to the Gemini (re)insurers, Willis manages the potential conflict through transparency and by ensuring that the Willis colleague acting for the (re)insured client on a given placement will always be different to the Willis colleague performing services to the Gemini (re)insurers. Further, none of the services provided by Willis to the Gemini (re)insurers would be provided to the (re)insured client or charged to it by Willis. By providing these services, Willis believes that its clients will enjoy discounted (re)insurance premium rates, increased access to attractively-rated (re)insurer capacity, quicker placement of risk and receipt of insurance documentation and more efficient claims processing.

Contact Willis, a WTW business

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Willis Australia Limited is authorised and regulated by the Australian Securities and Investments Commission.

AFSL 240600

About WTW

At WTW (NASDAQ: WTW), we provide data-driven, insight-led solutions in the areas of people, risk and capital. Leveraging the global view and local expertise of our colleagues serving 140 countries and markets, we help you sharpen your strategy, enhance organisational resilience, motivate your workforce and maximise performance. Working shoulder to shoulder with you, we uncover opportunities for sustainable success — and provide perspective that moves you.

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